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LAURENCE E. GOLD
Of Counsel

May 22, 2008

Rebecca Hough
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20006

Re: They Work For Us, Inc.
No. C30000889

Dear Ms. Hough:

I am responding on behalf of They Work For Us, Inc. ("TWFU") to your letter dated April 22, 2008, regarding the Form 9 filed by TWFU on April 1, 2008.

This Form 9 reports the first and only electioneering communications ever made by TWFU, which is a non-profit corporation organized under Section 501(c)(4) of the Internal Revenue Code and not a political committee. As the Form 9 indicates, the communication consisted of radio broadcasts of the same advertisement, titled "Lost His Way", that referred to Rep. Albert Wynn, who was a candidate in a primary election scheduled for February 12, 2008. The TWFU advertisement commenced airing on January 20 and ended airing on February 3, and TWFU financed the production and broadcast of the advertisement with a single payment on January 14 to the vendor who handled every aspect of those matters. We acknowledge that Form 9 first should have been filed on January 23, 2008, which is the day following the date on which the disbursements associated with the public distribution of the advertisement reached the \$10,000 reporting threshold.

Prior to producing and airing the advertisement, TWFU secured legal advice from the undersigned concerning its content, timing, financing and reporting under the Federal Election Campaign Act ("the Act"). However, TWFU inadvertently failed to designate clearly the staff responsibility for reporting the communications, an error attributable to the facts that TWFU is not a registrant under the Act and has never before incurred an obligation to report anything to the Commission, and that TWFU retains a small, part-time staff. In late March, an internal compliance check revealed that TWFU had not filed Form 9 as it had intended to, so TWFU immediately filed it, albeit late, with all of the requisite information, including the actual dates of the public distribution of the advertisement.

TWFU regrets its error in failing to report timely its disbursements for this electioneering communication. TWFU has changed its internal processes to ensure that, in the event it again

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